



CITY OF SAN JOSÉ, CALIFORNIA

SAN JOSÉ / SANTA CLARA WATER POLLUTION CONTROL PLANT
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ENVIRONMENTAL SERVICES DEPARTMENT

Todd Thompson
Associate Water Resources Control Engineer
Division of Water Quality
State Water Resources Control Board
P.O. Box 944213
Sacramento, CA 94244-2130

Re: Comments to DEIR for General WDR's for Biosolids Land Application

Mr. Thompson:

The San Jose/Santa Clara Water Pollution Control Plant offers the following comments to the Draft Environmental Impact Report covering General Waste Discharge Requirements for Biosolids Land Application:

1. Monitoring of EQ biosolids

Requiring the monitoring of EQ biosolids imposes an additional burden on a landholder, in addition to that by requiring background testing of the base soil. I believe the EPA's basis for choosing the pollutant limits (for EQ) was no accumulation problems with "average" base soil, so baseline testing does seem indicated. But if it can be demonstrated that pollutant concentrations in the base soil are at or below the EPA's "average" no monitoring of EQ biosolids should be required.

24-1

2. Leak-proof Trucks

Perhaps some distinction needs to be made between trucks carrying dry or very close to dry biosolids and those carrying liquid or semi-liquid biosolids. The trucks cum conveyor bottom commonly used to haul and spread dry biosolids do not leak the dry material (at least not when properly maintained) but would not be liquid tight. Indeed to make them so would make it hard to clean them between loads.

24-2

3. Proposed Molybdenum Concentration Limits

I understand that the limits for molybdenum are those from the original EPA part 503 rules from 1993, which EPA has abandoned. As I understand that EPA plans to issue revised molybdenum limits the general discharge requirements should take this into

24-3

account. Or at least include mechanisms to revise the limits to conform to EPA's current thinking (assuming that EPA adequately justifies their numbers).

24-3
(cont)

4. Pathogen Tests

I also understand that EPA is revising the indicator organisms and testing protocols for pathogens. As with the molybdenum limits, some acknowledgement, or mechanism to revise the general discharge requirements to conform to EPA's procedures is suggested.

24-4

Sincerely,

William K. Rudman, Jr.
Sanitary Engineer



Responses to Comments from the City of San Jose, Environmental Services Department

- 24-1. See Responses to Comments 16-15 and 23-37.
- 24-2. Comment noted. This requirement has been broken down to address the type of biosolids. The text of the proposed GO, as found in Biosolids Storage and Transportation Specifications No. 11 and 12 of Appendix A, now reads:
- 11. All biosolids shall be transported in covered vehicles capable of containing the designated load.~~and~~
 - 12. All biosolids having a water content that is capable of leaching liquids shall be transported in leak proof vehicles.
- 24-3. See Master Response 4.
- 24-4. Provision 13 of the proposed GO states that the GO can be revised based on new regulations or policies at the discretion of the SWRCB. Also, please see Master Response 6.